

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LAKE COUNTY PLASTERERS AND)	
CEMENT MASONS FRINGE BENEFIT)	
FUNDS,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 06 C 5037
vs.)	
)	JUDGE HARRY D. LEINENWEBER
BOUIE CONSTRUCTION, INC.,)	
a corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, BOUIE CONSTRUCTION, INC., a corporation, in the total amount of \$44,307.89, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$3,673.75.

On September 21, 2006, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on October 11, 2006. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 11th day of January 2007:

Mr. William T. Kaplan, Registered Agent
Bouie Construction, Inc.
Dykema Gossett, LLC
111 N. Ottawa Street
PO Box 943
Joliet, IL 60434-0943

/s/ Patrick N. Ryan

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